

DEPARTMENT OF AGRICULTURE  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20250

MEMORANDUM FROM SECRETARY GLICKMAN

TO: SUBCABINET

SUBJECT: Recommendations from the Secretary's Advisory Committee for Employees with Disabilities

The Secretary's Advisory Committee on Employees with Disabilities (SACED) has identified, through listening forums, a variety of critical issues concerning our employees with disabilities. Following these listening sessions, the SACED recommended actions to me for improving services to this segment of our employee population.

Today, I approved these recommendations and am asking for your cooperation in ensuring that they are fully implemented.

I am pleased that the SACED's work is bearing fruit, and I expect more initiatives in this area to be forthcoming. I am counting on the support of each and every one of you in this key Civil Rights area.

I have asked the SACED to report directly to me on your progress in implementing these recommendations, at six month intervals.

Attachment

## EMPLOYMENT

*ISSUE 1: Severe underrepresentation of employees with disabilities at higher grade levels.*

- Action:
1. The Office of Civil Rights (OCR) will analyze data and recommend results oriented actions for overcoming identified barriers to progress in hiring and promotion of persons with disabilities. OCR should conduct its analysis in collaboration with representatives from the Department level, field offices, agencies, human resources, civil rights, program areas, and employee groups and unions. The task group will:
    1. review statistical analyses in "A Time for Change" and the SACED survey to use as baseline measurements of employment issues;
    2. assess the pool of available candidates at mid-levels and senior levels, including education and occupational series;
    3. determine whether geographic mobility or other requirements -in certain agencies (such as FS, NRCS, APHIS, RD, FSA) tend to disadvantage persons with disabilities;
    4. analyze how goal-setting in preparing the annual USDA Affirmative Action for Individuals with Disabilities and Accomplishment Report plan is achieved, how it is communicated, and how agency heads are held accountable for achievement of goals;
    5. determine what other Departments and agencies are doing to improve representation; benchmark successful efforts; and

**Due Date and Lead:** OCR will present a report to the SACED within 60 calendar days from receipt of this memorandum. SACED will review the data and make recommendations to eliminate any adverse impact.

*ISSUE 2: Impact of office closings, consolidations, and moves on employees with disabilities.*

- Action:
1. OCR will review agency Civil Rights Impact Analyses and other data (e.g., data compiled by the SACED Statistics subcommittee) for the last 3 years to determine the impact of office closings, consolidations, and moves on employees with disabilities.

***EMPLOYMENT (continued)***

2. OCR will provide data to the SACED. SACED will review the data and make recommendations to eliminate any adverse impact.

**Due Date and Lead:** OCR will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

**ISSUE 3:** *Underutilization of available flexibilities such as telecommuting, and alternative work schedules in accommodating the needs of employees with disabilities.*

- Action:
1. The Office of Human Resources Management (OHRM) will broadly disseminate summarized information contained in the "U.S. Department of Agriculture Guide for Implementing a Family Friendly Workplace" regarding existing employment flexibilities available to all employees including those who require accommodation.
  2. OHRM will publicize the guide book on the USDA Home Page and emphasize the fact that employment flexibilities may be used as potential accommodations even in agencies and offices which do not otherwise permit them.

**Due Date and Lead:** OHRM will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

**ISSUE 4:** *Need for targeted recruitment of persons with disabilities.*

- Action:
1. OCR in collaboration with OHRM will conduct a workshop for agency recruiters or staffing specialists on the use of Memoranda of Understanding, job fairs, and other resources to reach out to persons with disabilities for permanent employment.
  2. OCR will publicize and more broadly disseminate its existing guidance regarding recruitment sources for agency heads and agency Human Resource offices to promote the hiring of persons with disabilities.

**Due Date and Lead:** OCR/OHRM will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

## PROGRAM ACCOUNTABILITY

*ISSUE 5: Need to improve physical accessibility of all USDA locations for employees and the general public.*

Action: Agencies and Departmental Administration will ensure that barriers are removed. Individuals with varied disabilities should be included in any physical accessibility review team.

**Due Date and Lead:** Responsible agencies/offices will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

*ISSUE 6: Need to hold agency heads accountable for conducting required '504' self-evaluation reviews.*

- Action:
1. OCR will draft a memorandum from the Secretary to agency heads whose agencies have not complied with the requirement to conduct "504" self-evaluations. The memorandum will request an explanation for non-compliance and an action plan for compliance.
  2. The OCR will schedule each non-compliant agency for a compliance review of the 504 program in fiscal year 2000.

**Due Date and Lead:** OCR will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

*ISSUE 7: Perceived insufficiency of parking for employees with disabilities.*

- Action:
1. Agency managers in collaboration with the Office of Operations (00), will review the current parking allocations and needs at all offices to determine if additional spaces are required for persons with disabilities.
  2. 00 will issue a memo to remind employees, managers, and parking coordinators to contact 00 to obtain parking spaces for persons with disabilities when needed.

**Due Date and Lead:** Responsible agencies/offices will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

## PROGRAM ACCOUNTABILITY (continued)

*ISSUE 8: Need for onsite reviews of agency Disability Employment Programs to make sure DEPM's responsible for reasonable accommodation issues are performing their duties in accordance with applicable regulation and EEOC guidance.*

**Action:** OCR will conduct onsite reviews of agency Disability Employment Programs. These reviews should be based on consultations with OGC representatives from the Department level, field offices, agencies, human resources, civil rights, program areas, and employee groups and unions.

**Due Date and Lead:** OCR will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

## COMMUNICATION: ACCESSIBLE MEETINGS, VIDEOS

*ISSUE 9: Need to market, publicize, and implement meeting accessibility guidance.*

**Action:**

1. OCR in collaboration with OO (TARGET Center) will develop, broadly disseminate, and implement policy-consistent with the "Making USDA Events Accessible" brochure, which provides guidance to ensure all program activities and events are accessible to people with disabilities.
2. OO will incorporate the accessibility policy in its operating procedures.
3. The Office of Communications will develop and implement policy requiring that all USDA produced or funded videos be "open captioned" and accessible to persons with a variety of disabilities.

**Due Date and Lead:** Responsible offices will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

## TRAINING

*ISSUE 10: Need for sensitivity and awareness training regarding accessible technology and disability issues for supervisors, managers, and co-workers of employees with disabilities in order to provide appropriate accommodations, enhance communication, and provide a positive work environment.*

Action:

1. OCR in collaboration with OO (TARGET Center) and consultation with supervisors, managers, and co-workers of employees with disabilities will develop a training module to address these issues.
2. Agency management and the TARGET Center will market accessible technology information.

**Due Date and Lead:** Responsible agencies/offices will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

*ISSUE 11: Need to ensure that Disability Employment Program Managers are adequately trained to perform their functions.*

Action: OCR will develop and conduct training for all Disability Employment Program Managers based on the enforcement guidance entitled "Reasonable Accommodation and Undue Hardship Under the American with Disabilities Act" issued by EEOC on March 1, 1999.

**Due Date and Lead:** OCR will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

*ISSUE 12: Perception that employees with disabilities do not have full access to effective training and participation in all available training opportunities.*

Action:

1. Agency managers should prepare annual individual development plans to ensure that persons with disabilities receive appropriate training.
2. USDA sponsored training should be advertised in alternative formats and in sufficient time to allow persons with disabilities to participate in training.

**Due Date and Lead:** Responsible agencies/offices will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.

## REASONABLE ACCOMMODATION PROCESS

*ISSUE 13: Need to establish and implement standard reasonable accommodation procedures within USDA for applicants and employees with disabilities.*

- Action:
1. OCR will issue a reasonable accommodation procedure which makes it easy and simple to request an accommodation in accordance with applicable laws and regulations.
  2. OCR will provide the draft procedure to the SACED for review and comment prior to the final issuance.
  3. OO will develop procedures for centralized funding to accommodate applicants and employees with disabilities.

**Due Date and Lead:** OCR/OO will complete action within 60 calendar days from receipt of this memorandum. SACED will monitor progress and review results.